

EXHIBIT B

Defendants' Local Patent Rule 4-3 Disclosure of Proposed Claim Constructions and Corresponding Identification of References¹

| # | Claim Term/Phrase | Asserted Claims | Defendants' Proposed Definition |
|----|-------------------|--|--|
| 1. | "aspheric" | '518: 1 '691: 21 '796: 1, 15, and 21 '378: 1 and 8 | <p>A non-spherical or flat planar surface expressed by the following conic and polynomial equation:</p> $X(Y)=(Y^2/R)/(1+\text{sqrt}(1-(1+k)*(Y/R)^2))+\sum(A_i)*(Y^i)$ <p>wherein:</p> <p>X: the height of a point on the aspheric surface at a distance Y from the optical axis relative to the tangential plane at the aspheric surface vertex;</p> <p>Y: the distance from the point on the curve of the aspheric surface to the optical axis;</p> <p>k: the conic coefficient;</p> <p>A_i: the aspheric coefficient of order i.</p> <p><u>Intrinsic Evidence</u></p> <p>'518 patent 5:16-35; 6:4-9; 7:25-32; 8:6-11; 9:42-49; 10:25-30; Tables 1-6.</p> <p>'691 patent 10:38-53; 11:54-58; 12:22-24; 13:25-</p> |

¹ Defendants reserve the right to add or remove claim terms from those proposed for construction, and to amend or supplement their produced constructions and/or the identification of extrinsic evidence. Defendants' reservation of rights includes making amendments or supplementations in response to Largan's proposed claim constructions, as a result of the meet and confer process with Largan, and/or as discovery continues. By proposing a construction for a claim term, or failing to propose a construction for a claim term, Defendants in no way admit that construction of a particular claim term is required, not required, or possible. Defendants reserve their right to challenge the validity of claims under 35 U.S.C. § 112 (as well as on any other ground) not required to be raised during the claim construction process, including but not limited to invalidity based on enablement or written description under pre-AIA 35 U.S.C. § 112, ¶ 1 and post-AIA 35 U.S.C. § 112(1). Defendants also reserve the right to cite additional extrinsic evidence, including dictionary definitions, citations to learned treatises and prior art, and testimony of percipient and expert witnesses, including to rebut the proposed constructions of Largan. Defendants also reserve the right to put forth expert testimony in support of their constructions and/or in response to any expert testimony Plaintiff may offer in support of its proposed constructions.

In order to narrow the claim construction issues, Defendants have narrowed the identified claim terms and proposed definitions below in relation to their earlier Local P.R. 4-1 disclosures and their Local P.R. 3-3 invalidity contentions. In doing so, however, Defendants do not waive the right to seek constructions of any previously-identified terms (including indefinite terms) if it becomes apparent that claim construction is, in fact, needed or required because Defendants and Plaintiffs dispute the claim constructions of any such terms. *See O2 Micro Intern. Ltd. v. Monolithic Power Systems, Inc.*, 467 F.3d 1355 (Fed. Cir. 2006).

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| | | | <p>30, 59-61; 14:53-58; 15:20-22; 16:24-28, 59-61; 17:62-67; 18:30-32; 19:15-20, 48-57; 20:42-48; 21:10-13; 22:15-20, 49-51; 23:52-56; 24:19-21; 25:23-28; Figs. 11-30B; Table 1 (Fig. 11); Table 2 (Fig. 12); Tables 3-21.</p> <p>'378 patent 8:22-39; 9:44-46; 10:24-30; 11:23-25; 13:10-12; 14:65-67; 16:65-67; 18:65-67; 20:65-67; 22:65-67; Tables 1-16.</p> <p>'796 patent 7:51-8:2; 9:5-7, 58-67; 12:12-14; 13:1-20; 14:33-35; 15:19-26; 16:51-53; 17:45-53; 18:65-67; 19:45-53; 20:65-67; 21:45-53; 22:65-67; 23:45-53; 24:65-67; 25:45-53; 26:65-67; 27:45-53; 28:65-67; 29:51-58; Tables 1-20.</p> <p><u>Extrinsic Evidence:</u></p> <p>Expert testimony from Dr. José Sasián.</p> <p>ZEMAX Development Corporation, ZEMAX Optical Design Program User's Manual, June 19, 2003.</p> <p>ZEMAX Development Corporation, ZEMAX Optical Design Program User's Manual, February 14, 2011.</p> <p>* Defendants also reserve the right to cite to or rebut any intrinsic or extrinsic evidence cited by Plaintiff.</p> |
| 2. | "half of the diagonal length of the effective pixel area of the electronic sensor is ImgH" | '691: 26, 27 | <p>This claim term is indefinite.</p> <p><u>Intrinsic Evidence</u></p> <p>'691 patent 1:21-24; Figs. 31, 32, 33.</p> <p><u>Extrinsic Evidence:</u></p> <p>Expert testimony from Dr. José Sasián.</p> |

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| | | | * Defendants also reserve the right to cite to or rebut any intrinsic or extrinsic evidence cited by Plaintiff. |
| 3. | "lens elements" | '518: 1 '691: 21 '796: 1, 15, and 21 '378: 1 and 8 | <p>The optical portion of a lens that refracts light to form an image, but excluding any mechanical or flange portion used to mount or attach the element.</p> <p><u>Intrinsic Evidence</u> '518 patent Tables 1-7; Figs. 1, 3, 5. '691 patent Figs. 1A, 2A, 3A, 4A, 5A, 6A, 7A, 8A, 9A, 10A, 11-33. '378 patent 6:63-66; Tables 1-16; Figs. 1, 3, 5, 7, 9, 11, 13, 15. '796 patent 6:4-7; Tables 1-20; Figs. 1A, 2A, 3A, 4A, 5A, 6A, 7A, 8A, 9A, 10A.</p> <p><u>Extrinsic Evidence:</u> Expert testimony from Dr. José Sasián.</p> <p>* Defendants also reserve the right to cite to or rebut any intrinsic or extrinsic evidence cited by Plaintiff.</p> |